

**FRENKEL LAMBERT**

FRENKEL LAMBERT WEISS WEISMAN &amp; GORDON, LLP

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Admitted: New York

Discovery:  
2:15-CV-06286 - SMA - GRB

July 20, 2015

*via First Class Mail*

Mr. Jason Brand  
23 Barrington Place  
Melville, New York 11747-4015

FILED  
U.S. DISTRICT COURT E.D.N.Y.

★ NOV 25 2015 ★

LONG ISLAND OFFICE

Re: Insured: DASO Development Corp.  
DASO Cleaning & Restoration, Inc.  
Claim No.: 550-106476  
Our file No.: 02-075209-100

Dear Mr. Brand:

As I have advised you before, this law firm has been retained by AIG Claims, Inc., the authorized representative of National Union Fire Insurance Company of Pittsburgh, Pa. ("National Union") to assist it in the evaluation of one or more claims presented by or on behalf of DASO Development Corp. and or DASO Cleaning & Restoration, Inc. (collectively, "DASO", the "Insureds" or the "Insured") on Crime Policies issued by National Union to the Insureds.

I enclose another copy of the letter that I sent to you on June 19, 2015, on behalf of National Union. This letter is virtually identical to one sent to Matthew J. Minero, Esq., of Kaufman Dolowich & Voluck, LLP on June 1, 2015, before Attorney Minero advised that his law firm does not represent you in connection with this matter. While you have had this letter for nearly a month, I have not received any acknowledgment that you have received it; nor any response, nor has that letter been returned as undeliverable.

Please acknowledge receipt of this communication and provide the documents and information requested in those letters in the next ten (10) days, and advise of your availability for Examination Under Oath during the week of August 10. Please advise of your intentions with respect to the claim or claims DASO is presenting.

National Union reserves its rights to disclaim upon any ground cited in its June 19, 2015 letter, or otherwise, including, but not limited to, the failure of the insured to cooperate in the investigation of the claim, to produce documents and information requested, and to appear at an Examination under Oath.

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Mr. Jason Brand  
August 6, 2015  
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July 20 letter. If I do not hear from you in the next fifteen (15) days, National Union will assume that you are no longer pursuing the claim(s) and will close its file regarding this matter with prejudice.

National Union reserves its rights to disclaim upon any ground cited in its June 19, 2015 letter, and/or its July 20, 2015 letter or otherwise, including, but not limited to, the failure of the insured to cooperate in the investigation of the claim, to produce documents and information requested, and to appear at an Examination under Oath; all grounds of coverage, noncoverage, exclusion and breach of Policy conditions.

National Union expressly reserves all rights and defenses under each Policy it has issued to DASO, and at law.

Very truly yours,

FRENKEL LAMBERT WEISS  
WEISMAN & GORDON, LLP

By:   
Daniel W. White

DWW/paw  
Encl.

cc: Barbara A. Leone, AIG Claims, Inc.  
Brandi Monique, AIG Claims, Inc.